

EXHIBIT A

EXPERT REPORT

THOMAS KINNEY, M.D., M.S.M.E.

ANNE CHRISTINE ROBERTS, M.D.

SANJEEVA KALVA M.D.

Angel Filter [A tethered temporary filter inserted from a femoral site that can also be used for venous access]. In the role of Data Safety Monitor Chair for the Crux trial, I was responsible for halting the trial after filter fractures were identified and design changes were implemented and the trial successfully restarted.

25. My opinions are based on my knowledge and expertise of IVC filters and my own personal experience with Recovery and G2 filters and documentation, data, and evidence I have seen for the first time in 2017. Plaintiffs' counsel has provided me open access to a database that contains Bard internal documents and depositions of Bard employees, past and present. I have also been provided with the expert report of Dr. David Kessler, former commissioner of FDA; the expert biostatistics report of Dr. Rebecca Betensky; Engineering reports of Dr. Robert McMeeking and Dr. Robert Ritchie.

26. Had I been aware of this evidence I would not have used the early Bard devices (RNF and G2), nor would I have agreed to act as a paid consultant to Bard. I would have recommended a long-term follow-up study of the RNF as recommended by Dr. Asch to better understand and document performance characteristics of this filter. I would have strongly urged Bard to not launch RNF and G2, or to immediately recall both products very shortly (3-4 months) after releasing each for widespread use based on the adverse complications and injuries that were being reported by many of my colleagues and Bard's internal analyses of same.

27. My billing rate is \$700 per hour.

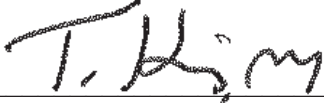
28. I have reviewed the material referred here in and listed in our Facts and Data Considered, Appendix A.

29. I understand I may be called upon to offer opinions in rebuttal to experts designated by Defendants.

XIII. SIGNATURES

Thomas Kinney, M.D., M.S.M.E.

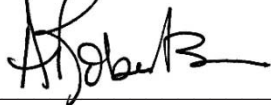
Signed this 6th day of March, 2017

A handwritten signature in black ink, appearing to read 'T. Kinney', written over a horizontal line.

Thomas Kinney, M.D., M.S.M.E.

Anne Roberts M.D.

this 6th day Signed of March, 2017

A handwritten signature in black ink, appearing to read 'A. Roberts', written over a horizontal line.

Anne Roberts M.D.

Sanjeeva Kalva M.D.

Signed this 6th day of March, 2017

See attached signature

Sanjeeva Kalva M.D.

Anne Roberts M.D.

Signed this 6th day of March, 2017

Anne Roberts M.D.

Sanjeeva Kalva M.D.

Signed this 6th day of March, 2017

A handwritten signature in black ink, appearing to be 'SK', is written over a horizontal line.

Sanjeeva Kalva M.D.